

SRI v. ISS and Symantec

(Amended) Exhibit 11 to the Proposed Pretrial Order

**WITNESSES SRI INTENDS TO CALL TO TESTIFY
EITHER IN PERSON OR BY DEPOSITION PURSUANT TO LR 16-4(d)(7)**

SRI anticipates putting on its case-in-chief on the issue of infringement by both defendants in an efficient manner. To that end, SRI intends to call the following witnesses either “live” or by deposition in its case-in-chief. SRI cannot anticipate all of the objections and issues that may arise as SRI presents its case. SRI expects to call fewer witnesses. Those witnesses whose names are followed by “(SRI)” can be reached through counsel for SRI. The names of individuals affiliated with each defendant or who were represented at deposition by defendants’ counsel are followed by “(Symantec)” or “(ISS)” and can presumably be reached through litigation counsel. SRI also reserves the right to call anyone appearing on either of Symantec’s or ISS’s witness lists.

Patrick Lincoln (SRI)

Phillip Porras (SRI)

Alfonso Valdes (SRI)

George Kesidis (expert) .

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Specialty: Cyber security and network intrusion detection

Paul Griswold (ISS)

Robert McEwin (ISS)

Bernard Palmer (ISS)

Jim Pruss (ISS)

Holly Stewart (ISS)

Peter Tosto (ISS)

Paul Agbabian (Symantec)

Mark Bagley (Symantec)

Jeremy Bennett (Symantec)

Robert Geiger (Symantec)

Grant Geyer (Symantec)

Brian Hernacki (Symantec)
Sandeep Kumar (Symantec)
Howard Lev (Symantec)
William Luk (Symantec)
Edward Taranto (Symantec)
Robert Allen
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Robert Ferrill
One HealthSouth Parkway
Birmingham, Alabama 35243
Andrew Gault
1610 Morningside Ave.
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Douglas Song
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SRI's rebuttal case on the issues of validity and enforceability will be responsive to the evidence presented by defendants. Defendants have identified nearly 300 prior art references and have articulated various theories of unenforceability. Moreover, because this list of witnesses is being exchanged simultaneously with defendants, SRI is unable to know from which witnesses it will be able to elicit testimony on cross examination. As such, SRI cannot accurately identify the witnesses it may call either live or by deposition in its rebuttal case. SRI identifies the following individuals which it may call in its rebuttal case, but expects to call far fewer witnesses.

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Robert Graham (ISS)
Jim Innes (ISS)
Joe Kleinwaechter (ISS)
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Enrique Salem (Symantec)

Col. Timothy Gibson

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